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EXECUTIVE SECRETARY

June 25, 2001

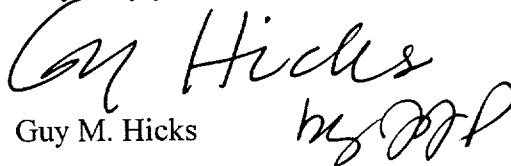
Mr. David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: *Docket to Establish Generic Performance Measurements, Benchmarks and  
Enforcement Mechanisms for BellSouth Telecommunications, Inc.*  
Docket No. 01-00193

Dear Mr. Waddell:

Enclosed please find the original and thirteen (13) copies of BellSouth's responses to ATM/Discount's First Interrogatories. Copies of the enclosed have been furnished to counsel of record.

Very truly yours,

  
Guy M. Hicks

GMH/jej

Enclosure

## CERTIFICATE OF SERVICE

I hereby certify that on June 25, 2001, a copy of the foregoing document was served on the following parties, via the method indicated:

☐ Hand  
☐ Mail  
☒ Facsimile  
☐ Overnight

James Lamoureux, Esquire  
AT&T  
1200 Peachtree St., NE  
Atlanta, GA 30309

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☐ Mail  
☒ Facsimile  
☐ Overnight

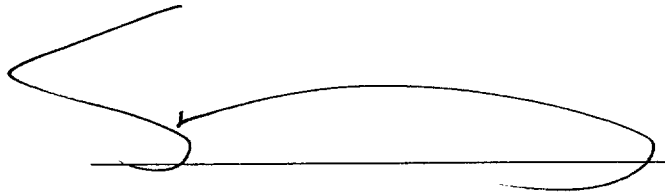
Henry Walker, Esquire  
Boult, Cummings, et al.  
P. O. Box 198062  
Nashville, TN 37219-8062

☐ Hand  
☐ Mail  
☒ Facsimile  
☐ Overnight

Jon E. Hastings, Esquire  
Boult, Cummings, et al.  
P. O. Box 198062  
Nashville, TN 37219-8062

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☐ Overnight

Charles B. Welch, Esquire  
Farris, Mathews, et al.  
618 Church St., #300  
Nashville, TN 37219

A handwritten signature in black ink, consisting of a large, stylized loop followed by a horizontal line.

REQUEST: Explain what steps, if any, BellSouth has taken since January 1, 2000, to improve service at the Local Carrier Service Center ("LCSC"). Include the following information:

- a. How many, if any, additional staff has been added? When were they added? Why were they added?
- b. To what degree have response times (the time to answer the telephone and the time to assist a caller) improved?

RESPONSE:

- a. From year end 1999 to January 2001, the LCSC has added 289 employees. The additional staff was added to support the processing of complex manual service requests and to meet tighter performance measurements.
- b. Since September 2000, when the average speed of answer was approximately 13 minutes, the average speed of answer has declined to approximately 2.5 minutes. The time to respond to a specific inquiry varies depending on the question asked and therefore, BellSouth does not keep comparable data on the average time it takes to actually answer the inquiry.

This improvement is largely due to the creation of the Fleming Island LCSC that was placed on line in late January 2001. Operating solely as a call center, the Fleming Island LCSC has been able to handle calls faster and more effectively. This has created efficiencies by allowing Birmingham and Atlanta LCSCs to concentrate on processing orders.

Other LCSC CLEC improvements consist of providing CLECs with web-based tools giving them needed information without the need to actually interface with the LCSC.

RESPONSE: (Cont'd)

These additional tools are listed as follows:

- The CLEC Service Order Tracking System (CSOTS) allows the CLEC to view, copy and track the status of their manually submitted requests. See Attachment No. 1 for carrier notice SN91081614.
- Creation of the Loss Notification Report that provides timely loss notice to a CLEC where an end user has switched local service providers. See Attachment No. 1 for carrier notice SN91081709.
- Improvements to the PON status report to provide updates 5 times per day Monday through Saturday and to include PONs rejected due to error. The PON status report provides status on a particular PON (CLEC purchase order number PON) to allow for tracking via a PON number. See Attachment No. 1 for carrier notices SN91081671 and SN91081687.

REQUEST: List the time and dates since January 1, 2000, when LENS was not operating or not operating properly. Include scheduled maintenance or repairs and provide copies of notices of such scheduled maintenance sent to customers.

RESPONSE: BellSouth has previously objected to this interrogatory. Subject to and without waiving the objection previously provided, BellSouth provides the following:

A Type 1 System Outage as defined in the Change Control Process is a BellSouth outage where the system is totally unusable or there is degradation in an existing feature or functionality within the interface. If a verified outage is not resolved within 20 minutes, a notification will be provided via email and posted to the web within 15 minutes. A list of Type 1 System Outages can be found per interface on BellSouth's website at:

[http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/ccp\\_s\\_o.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp_s_o.html)

Scheduled maintenance and repair are conducted during the hours when LENS is not suppose to be available. Following is a copy of our OSS Application Availability report. For instance, Monday through Friday, maintenance would be conducted between the hours of 1 and 4 A.M. This report can be found on the BellSouth Interconnection web site at:

[www.interconnection.bellsouth.com/carriertypes/lec/html/oss\\_info.html](http://www.interconnection.bellsouth.com/carriertypes/lec/html/oss_info.html)

RESPONSE: (Cont'd)

**Local Exchange Carriers**

**OSS Information Center: OSS Statistics/Benchmarking**

**OSS System Availability**

The OSS System Availability report is now located on the Performance Measurements web site which can be accessed at <https://pmap.bellsouth.com>. You will need a user id and password to access the reports on this site.

To request a password, click on the "Login" link and then on "Request A Password".

**New! OSS Back End System Hours Of Availability (SOCS -Service Order Communication System )**

[www.interconnection.bellsouth.com/oss/ossbe\\_hour.html](http://www.interconnection.bellsouth.com/oss/ossbe_hour.html).

**OSS System Hours of Availability**

System	Sun	Mon	Tues	Wed	Thurs	Fri	Sat
EDI Mainframe	0000-1800	0100-2359	24 Hours	24 Hours	24 Hours	24 Hours	24 Hours
EDI Unix	0500-2359	24 Hours	24 Hours	24 Hours	24 Hours	24 Hours	24 Hours
LEO Mainframe	0000-1800	0100-2359	24 Hours	24 Hours	24 Hours	24 Hours	0400-2359
LEO Unix	0000-1800	0100-2359	24 Hours	24 Hours	24 Hours	24 Hours	0400-2359
LESOG	0000-1800	0100-2359	24 Hours	24 Hours	24 Hours	24 Hours	0400-2359
LENS	1000-2359	0000-0100 0400-2359	0000-0100 0400-2359	0000-0100 0400-2359	0000-0100 0400-2359	0000-0100 0400-2359	0400-2200
TAFI	0900-2359	0000-0100 0400-2359	0000-0100 0400-2359	0000-0100 0400-2359	0000-0100 0400-2359	0000-0100 0400-2359	0000-0100 0400-2200
TAG	0000-0200 0400-2359	0000-0100 0400-2359	0000-0100 0400-2359	0000-0100 0400-2359	0000-0100 0400-2359	0000-0100 0400-2359	0400-2359

**Notes:**

- LENS is available from Sunday 1800 to Monday 0100 for pre-order only.
- LEO Unix, LEO Mainframe, LESOG and EDI Hours shown are Central time.
- LENS, TAG and TAFI times should be interpreted as Eastern or Central depending on which state's data is being accessed, i.e., when accessing data for a state predominantly in the Eastern Time Zone, availability hours should be interpreted as Eastern, otherwise, times should be interpreted as Central.
- For EDI the Harbinger VAN is available 24 hours every day.

RESPONSE: (Cont'd)

A scheduled repair/maintenance occurred on December 7, 2000 during a LENS non-available window time. The activities performed by BellSouth required no work on behalf of the CLEC community. In Carrier Notification SN91082158, dated January 11, 2001, BellSouth states, "...with the continuous growth in the CLEC community and to resolve the capacity issue problems with LENS, BellSouth authorized and installed a new Telecommunication Access Gateway (TAG) Security Server on December 7, 2000. The additional server capacity will allow the CLECs to experience improvements with the LENS interface. BellSouth is working diligently to continuously enhance its OSSs. Numerous upgrades and systems enhancements are scheduled throughout 2001 to optimize the CLEC experience. BellSouth apologizes for any inconvenience the recent problems may have caused your company."

Futhermore, in the BellSouth Business Rules for Local Ordering – OSS99 TCIF9 and LSOG4 Network & Carrier Services, in section 2.6.2 Electronic Downtime, BellSouth states that, "Occasionally, BellSouth may experience brief periods outside of normal maintenance downtime where a specific system is unavailable for CLECs to transmit mechanized LSRs. If a CLEC must submit a particular LSR manually before the electronic system is restored to service, BellSouth will apply the mechanized LSR charge instead of the manual LSR charge for that service request." The procedure is to populate the LSR number field in the Administrative Section on the first page of the LSR form with the code "SOMECE".

REQUEST: Provide a copy of every complaint, written or oral, received since January 1, 2000, regarding:

- a. LENS,
- b. The LCSC

RESPONSE: a. BellSouth has objected to this request on the grounds that it is unduly broad and burdensome in its scope. Further, BellSouth has objected to providing information concerning communications between BellSouth and CLECs other than ATM/discount. Complaints from other CLECs, if they existed and could be recovered, would generally contain information proprietary to that CLEC, i.e. customer-specific information. Presumably ATM/Discount has copies of its own complaints and BellSouth's responses.

b. BellSouth has objected to this request as specified in subsection a. preceding.



REQUEST: Explain the application, if any, of performance measures and penalties supported by BellSouth:

- a. regarding the operation of LENS; and
- b. regarding response times at the LCSC.

RESPONSE:

- a. LENS is an interface application between CLECs and BellSouth's Legacy Systems. As such BellSouth has two performance measures that impact LENS, Average Response Time and Response Interval and Interface Availability.

Average Response Time and Response Interval – the average response time for retrieving pre-order/order information from a given legacy system is determined by summing the response times for all requests submitted to the legacy systems during the reporting period and dividing by the total number of legacy system requests per month.

The response time starts when the client application, in this case, LENS submits a request to the legacy system and ends when the appropriate response is returned to the client application. The number of accesses to the legacy systems during the reporting period which takes less than 2.3 seconds, the number of accesses which takes more than 6 seconds, and the number which is less than or equal to 6.3 seconds is also captured.

Interface Availability is the percent of time OSS interface is functionally available compared to scheduled availability.

RESPONSE: (Cont'd)

- b. Response times at the LCSC are captured in BellSouth's measurement Speed of Answer in the Ordering Center.

Speed of Answer in the Ordering Center – measures the average time a customer is in queue. The clock starts when the appropriate option is selected, (i.e., 1 for Resale Consumer, 2 for Resale Multiline, and 3 for UNE-LNP, etc.) and the call enters the queue for that particular group in the LCSC. The clock stops when a BellSouth service representative in the LCSC answers the call. The speed of answer is determined by measuring and accumulating the elapsed time from the entry of a CLEC call into the BellSouth automatic call distributor (ACD) until a service representative in BellSouth's LCSC answers the CLEC call.

BellSouth has proposed a set of enforcement mechanisms associated with key outcome oriented measures in its Service Quality Measurements proposal in the DeltaCom arbitration proceeding. *See* Docket No. 99-00430. Moreover, as part of the generic performance measurement docket, BellSouth will be proposing a set of enforcement mechanisms associated with key outcome oriented measures in its Service Quality Measurements proposal.